

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: ABBOTT LABORATORIES, *et al.*,
PRETERM INFANT NUTRITION
PRODUCTS LIABILITY LITIGATION**

MDL No. 3026

Master Docket No. 1:22 CV 00071

This Document Relates to:

Judge Rebecca R. Pallmeyer

Diggs v. Abbott Laboratories, Case No. 1:22-CV-
05356

**DECLARATION OF ASHLIE CASE SLETVOLD IN SUPPORT OF PLAINTIFF'S OMNIBUS MOTION
TO EXCLUDE CERTAIN PROPOSED EXPERT TESTIMONY**

I, Ashlie Case Sletvold, state and declare as follows:

1. I am a member of the Plaintiffs' Executive Committee in this MDL and submit this declaration in support of Plaintiffs' Plaintiff's Omnibus Motion to Exclude Certain Proposed Expert Testimony. I have personal knowledge of the facts and assertions set forth below and if called to testify would do so consistently with those facts.

2. Attached as Exhibit 1 is a true and accurate copy of the Report of Dr. Camilia Martin.

3. Attached as Exhibit 2 is a true and accurate copy of the Deposition Transcript of Dr. Camilia Martin (vol. 3) (Feb. 12, 2025).

4. Attached as Exhibit 3 is a true and accurate copy of the Transcript of Proceedings – Pretrial Conference in Case No. 1:22-cv-00232 (Apr. 17, 2025).

5. Attached as Exhibit 4 is a true and accurate copy of the Deposition Transcript of Dr. Camilia Martin (vol. 1) (Feb. 11, 2025).

6. Attached as Exhibit 5 is a true and accurate copy of the Vermont Oxford Network Policy on Data Use.

7. Attached as Exhibit 6 is a true and accurate copy of the Vermont Oxford Network Policy and Guidelines for Collaborative Research Using the Vermont Oxford Network Databases.

8. Attached as Exhibit 7 is a true and accurate copy of the Third Amended Reliance List of Dr. Camilia Martin.

9. Attached as Exhibit 8 is a true and accurate copy of the Report of Dr. Brian Smith.

10. Attached as Exhibit 9 is a true and accurate copy of the abstract of Richard J. Schanler, et al., *Feeding Strategies for Premature Infants: Beneficial Outcomes of Feeding Fortified Human Milk Versus Preterm Formula*, 103 Pediatrics 1150 (1999).

11. Attached as Exhibit 10 is a true and accurate copy of the abstract of Amy B. Hair, et al., *Beyond Necrotizing Enterocolitis Prevention: Improving Outcomes with an Exclusive Human Milk-Based Diet*, 11 Breastfeeding Med. 70 (2016).

12. Attached as Exhibit 11 is a true and accurate copy of the abstract of Syed M. Assad, et al., *Decreased cost and improved feeding tolerance in VLBW infants fed an exclusive human milk diet*, 36 J. Perinatology 216 (2016).

13. Attached as Exhibit 12 is a true and accurate copy of the abstract of Juliane Spiegler, et al., *Does Breastmilk Influence the Development of Bronchopulmonary Dysplasia?*, 169 J. Pediatrics 76 (2016).

14. Attached as Exhibit 13 is a true and accurate copy of the abstract of Paula M. Sisk, et al., *Necrotizing Enterocolitis and Growth in Preterm Infants Fed Predominantly Maternal Milk, Pasteurized Donor Milk, or Preterm Formula: A Retrospective Study*, 34 Am. J. Perinatology 676 (2017).

15. Attached as Exhibit 14 is a true and accurate copy of the abstract of Wenjing Peng, et al., *The Association of Human Milk Feeding With Short-Term Health Outcomes Among Chinese Very/Extremely Low Birth Weight Infants*, 38 J. Human Lactation 670 (2022).

16. Attached as Exhibit 15 is a true and accurate copy of the abstract of Daniel J.C. Berkhout, et al., *Risk Factors for Necrotizing Enterocolitis: A Prospective Multicenter Case-Control Study*, 114 Neonatology 277 (2018).

17. Attached as Exhibit 16 is a true and accurate copy of the abstract of Aleksandra Kaplina, et al., *Necrotizing Enterocolitis: The Role of Hypoxia, Gut Microbiome, and Microbial Metabolites*, 24 Int. J. of Molecular Sciences 2471 (2023).

18. Attached as Exhibit 17 is a true and accurate copy of the abstract of Maria Quigley, et al., *Formula versus donor breast milk for feeding preterm or low birth weight infants*, Cochrane Database Sys. Review (2019).

19. Attached as Exhibit 18 is a true and accurate copy of the Report of Dr. Alex Williamson.

20. Attached as Exhibit 19 is a true and accurate copy of the Deposition Transcript of Dr. Alex Williamson (Jan. 10, 2025).

21. Attached as Exhibit 20 is a true and accurate copy of the Medical Records of Kamari Brown (May 10, 2015) (Minor-KB-UniversityMMC-MD-002426-003054).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 2, 2025.

/s/ Ashlie Case Sletvold
Ashlie Case Sletvold